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August 4, 2023

Via ECF

The Honorable Jessica G.L. Clarke, USDJ United States Courthouse Eastern District of New York 500 Pearl Street New York City, NY 10007

Re: Overton v. Source Receivables Management LLC

Case No. 1:23-cv-05344-JGLC

Motion on Consent for Adjournment of Initial Conference &

Leave to File Amended Complaint

Dear Judge Clarke:

As the court is aware this matter was originally commenced *pro se* by the Plaintiff, in the Civil Court of the City of New York, County of Bronx. The action was subsequently removed by the Defendant on June 23, 2023 [ECF No. 1].

The undersigned has been retained as counsel for the Plaintiff in the above referenced matter currently pending before this court. A notice of appearance has been filed [ECF No. 7].

We respectfully request that the Initial Pre-Trial Conference scheduled for August 9, 2023 be adjourned for at least 30 days to a date and time convenient for the court. Plaintiff requests this adjournment so her counsel can further familiarize himself with her file and evaluate Plaintiff's causes of action in this matter.

Counsel for Defendant consents to this request.

The undersigned also notes that Defendant also consents to allowing Plaintiff 30 days to file an amended complaint pursuant to Rule 15(a)(2).

Plaintiff thanks the court in advance for its courtesy and consideration in this matter.

Sincerely,

/s/ Abel L. Pierre
Abel L. Pierre, Esq.
Counsel for Plaintiff

The Initial Pretrial Conference scheduled for August 9, 2023 is hereby ADJOURNED to September 27, 2023 at 3:00 p.m. The conference will be held via Microsoft Teams. The parties shall submit the joint letter and proposed case management plan, see ECF No. 5, no later than September 20, 2023.

SO ORDERED.

Dated: August 7, 2023 New York, New York

> JESSICA G. L. CLARKE United States District Judge

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